

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI

VANESSA COONCE,

Plaintiff,

vs.

STATE FARM FIRE AND CASUALTY
COMPANY,

Defendant,

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Case No. _____

**NOTICE OF REMOVAL OF CAUSE TO THE UNITED STATES
DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI**

TO: THE HONORABLE JUDGE OF SAID COURT:

The Petitioner, State Farm Fire and Casualty Company, Defendant herein, shows the Court as follows:

1. That there was commenced and is now pending in the Circuit Court of Jackson County, Missouri a civil action in which Vanessa Coonce is the Plaintiff, and the Petitioner herein, State Farm Fire and Casualty Company, is the Defendant; said case captioned as *Vanessa Coonce v. State Farm Fire and Casualty Company*, Case No. 2016-CV18863.

2. That said action is a civil suit, of which this Court has original jurisdiction under the provisions of Title 28, U.S. Code, Section 1332, as amended, and is one which may be removed to this Court by Petitioner, State Farm Fire and Casualty Company, Defendant therein, pursuant to the provisions of Title 28, U.S. Code, Section 1441, in that it is a civil action wherein the amount in controversy exceeds the sum or value of Seventy-Five Thousand and No/100 Dollars (\$75,000.00), exclusive of interest and costs, and is between citizens of different states.

3. That said cause of action involves a controversy between citizens of different states,
to-wit:

a. The Plaintiff, Vanessa Coonce, is now, and was at the commencement of this action, a citizen of the State of Missouri.

b. The Petitioner, State Farm Fire and Casualty Company, as Defendant, is now, and was at the commencement of this action, a citizen of and with its principal place of business in the State of Illinois.

4. That this Notice of Removal is filed within thirty (30) days after receipt by Petitioner of a copy of the Plaintiff's Petition for Damages setting forth the claim for relief by the Plaintiff on which the action is based, wherein Plaintiff has sought damages in excess of Seventy-Five Thousand and No/100 Dollars (\$75,000.00) and therefore within the jurisdiction of this Court, and the time for filing this Notice of Removal under the statutes of this United States has not expired.

5. That there is filed herewith, and by reference made a part hereof, **a true and correct copy of all process, pleadings and orders filed** in reference to the above-captioned matter in the Circuit Court of Jackson County, Missouri.

WHEREFORE, Petitioner prays that further proceedings in the Circuit Court of Jackson County, Missouri to be discontinued, and that this action be removed to the United States District Court for the Western District of Missouri.

WALLACE SAUNDERS, P.C.

BY: /s/ Brian G. Boos
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ATTORNEYS FOR STATE FARM FIRE AND
CASUALTY COMPANY

The undersigned hereby certifies that a true and correct copy of the above and foregoing was electronically filed with the United States District Clerk using the CM/ECF system which will send notification and provide access to a copy of this filing on the 2nd day of December, 2020, to:

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